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U.S. DISTRICT COURT  
DISTRICT OF NEBRASKA

2019 AUG 21 PM 4:31

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRANDON L. SWENSON,

Defendant.

4:19CR 3093

INDICTMENT  
18 U.S.C. § 2261A(2)

The Grand Jury charges that

COUNT I

On or about June 24, 2019, in the District of Nebraska, and elsewhere, the Defendant, BRANDON L. SWENSON, with the intent to harass and intimidate, and place under surveillance with the intent to harass, and intimidate another person, to wit, the person hereinafter identified as "Victim 1", used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to Victim 1 and immediate family members of Victim 1.

In violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT II

On or about June 25, 2019, in the District of Nebraska, and elsewhere, the Defendant, BRANDON L. SWENSON, with the intent to harass and intimidate, and place under surveillance with the intent to harass, and intimidate another person, to wit, the person hereinafter identified as "Victim 1", used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate or foreign

commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to Victim 1 and immediate family members of Victim 1.

In violation of Title 18, United States Code, Section 2261A(2)(B).

### COUNT III

On or about June 25, 2019, in the District of Nebraska, and elsewhere, the Defendant, BRANDON L. SWENSON, with the intent to harass and intimidate, and place under surveillance with the intent to harass, and intimidate another person, to wit, the person hereinafter identified as "Victim 1", used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to Victim 1 and immediate family members of Victim 1.

In violation of Title 18, United States Code, Section 2261A(2)(B).

### COUNT IV

On or about June 25, 2019, in the District of Nebraska, and elsewhere, the Defendant, BRANDON L. SWENSON, with the intent to harass and intimidate, and place under surveillance with the intent to harass, and intimidate another person, to wit, the person hereinafter identified as "Victim 1", used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to Victim 1 and immediate family members of Victim 1.

In violation of Title 18, United States Code, Section 2261A(2)(B).

COUNT V


On or about June 25, 2019, in the District of Nebraska, and elsewhere, the Defendant, BRANDON L. SWENSON, with the intent to harass and intimidate, and place under surveillance with the intent to harass, and intimidate another person, to wit, the person hereinafter identified as "Victim 1", used an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facilities of interstate or foreign commerce, including electronic mail and internet websites, to engage in a course of conduct that caused, attempted to cause and would be reasonably expected to cause substantial emotional distress to Victim 1 and immediate family members of Victim 1.

In violation of Title 18, United States Code, Section 2261A(2)(B).

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Lincoln, Nebraska, pursuant to the rules of this Court.

  
STEVEN A. RUSSELL #16925  
Assistant U.S. Attorney